




APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 9/1/23

Defendant shall provide Pretrial services with his travel itinerary.

August 31, 2023

**VIA ECF**

Hon. Vernon S. Broderick  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 518  
New York, New York 10007

**Re: *United States v. Moises Lluberes*, 20-cr-493 (VSB)**

Dear Judge Broderick:

I write on behalf of defendant Moises Lluberes in the above-referenced matter to respectfully request the temporary modification of his conditions of pretrial release to permit him to travel to Las Vegas, Nevada from September 11, 2023 through September 15, 2023 to attend an important in person meeting for his employment.

I have discussed this request with the government and Pretrial Services. Pretrial Services (Officer DeFeo) objects, but PTS's objection is based only on the Office's blanket policy to object to overnight travel for any defendant subject to home detention. PTS confirmed, however, that Mr. Lluberes has been fully compliant with his conditions of release throughout his nearly three year period of pretrial supervision. The government takes no position on this request, and defers to Pretrial Services.

Respectfully Submitted,

MEISTER SEELIG & FEIN PLLC

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/s/ IH

Henry E. Mazurek  
Ilana Haramati

*Counsel for Defendant Moises Lluberes*

cc: Counsel of Record (*via ECF*)